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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MATTHEW WADE BEASLEY,

Defendant.

Case No. 2:23-cr-00066-JAD-DJA

**Stipulation and Order to Continue
Motions, Calendar Call, and Trial Dates
(Second Request)**

IT IS HEREBY STIPULATED AND AGREED, by and between Jason M. Frierson, United States Attorney, and Daniel R. Schiess, Assistant United States Attorney, counsel for the United States of America, and Jacqueline Tirinnanzi, Esq., counsel for Defendant Matthew Beasley, that the trial in this matter currently set for February 6, 2024, be vacated and continued to a date and time convenient to the Court no sooner than 90 days.

IT IS FURTHER STIPULATED AND AGREED that the deadline for filing any and all pretrial motions, responses, and reply briefs be continued and reset as set forth below and in conjunction with the Proposed Complex Case Schedule filed in this case, ECF 24.

1 This stipulation is entered into for the following reasons:

2 1. The parties have stipulated that this case should be designated as complex under
3 Title 18, United States Code, Section 3161(h)(7)(B)(ii), and LCR 16-1(a),

4 2. As stated in Proposed Complex Case Schedule, and reiterated herein:

5 a. Discovery is voluminous, consisting of hundreds of thousands of pages of
6 records and other documents.

7 b. The nature of the charges in this case involves financial transactions
8 requiring detailed analysis of voluminous financial records and documents.

9 c. Numerous items of potential discovery are subject to a filter review for
10 potentially privileged attorney-client communications and possibly a court review and
11 court order.
12

13 3. As stated in the Proposed Complex Case Schedule, and reiterated herein, the
14 parties further stipulate that any and all pretrial motions under Rule 12(b), Federal Rules of
15 Criminal Procedure, shall be filed as follows: pretrial motions no later than 90 days before trial,
16 responses due within 30 days of receipt of pretrial motions, and optional replies within 14 days
17 after receipt of response. The parties shall file any and all notices required under Rules 12.1
18 through 12.3, no later than 60 days prior to trial.

19 4. The defendant is in custody and does not object to the continuance.

20 In light of the complex case designation and to afford the time necessary to prepare for
21 trial and prevent any miscarriage of justice, the parties stipulate that the ends of justice outweigh
22 the interests of the public and defendant in a speedy trial and that all delay necessitated by the
23 continuance of this matter should be excluded under Title 18, United States Code, Section
24 3161(h)(7)(A) when considering the factors delineated in Title 18, United States Code, Sections
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1 3161(h)(7)(B)(i) and (ii).

2 This is the second request for a continuance of the trial and motions dates.

3
4 DATED December 15, 2023.

5
6 Respectfully Submitted,

7 JASON M. FRIERSON
8 United States Attorney

9 /s/ Jacqueline Tirinnanzi
10 JACQUELINE TIRINNANZI
11 Counsel for Defendant Matthew Beasley

12 /s/ Daniel R. Scheiss
13 DANIEL R. SCHEISS
14 Assistant United States Attorney

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UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

UNITED STATES OF AMERICA,

Plaintiff,

vs.

MATTHEW WADE BEASLEY,

Defendant.

Case No. 2:23-cr-00066-JAD-DJA

**Stipulation and Order to Continue
Motions, Calendar Call, and Trial Dates
(Second Request)**

Based on the stipulation of counsel, good cause appearing, the Court finds that:

1. This the first request for continuance.
2. The parties have stipulated that this case should be designated as complex under Title 18, United States Code, Section 3161(h)(7)(B)(ii), and LCR 16-1(a).
3. Discovery is voluminous, consisting of hundreds of thousands of pages of records and other documents.
4. The nature of the charges in this case involves financial transactions requiring detailed analysis of voluminous financial records and documents.
5. Numerous items of potential discovery are subject to a filter review for potentially privileged attorney-client communications and possibly a court review and court order.
6. The defendant is in custody and does not object to the continuance.

1 7. Denial of this request for a continuance of the trial date, calendar call, and
2 motions date would prejudice the defendant, the Government, and unnecessarily consume the
3 Court's resources, taking into account the exercise of due diligence.

4 8. The ends of justice served by granting the continuances outweigh the best
5 interests of the public and the defendant in a speedy trial. The additional time requested by the
6 stipulation is excludable in computing the time within which the trial herein must commence
7 pursuant to the Speedy Trial Act, 18 U.S.C. § 3161(h)(7)(A), when considering the factors
8 under 18 U.S.C. § 3161(h)(7)(B)(i) and (ii):
9


10 IT IS THEREFORE ORDERED that

11 1. The trial date currently scheduled for February 6, 2024, be vacated and continued
12 to June 4, 2024, at 9:00 a.m.

13 2. The calendar call scheduled for January 29, 2024, be vacated and continued to
14 May 20, 2024, at 1:30 p.m.

15 3. The dates for the filing of motions, responses, and replies as follows: any and all
16 pretrial motions under Rule 12(b), Federal Rules of Criminal Procedure shall be filed no later
17 than 90 days before trial, responses due within 30 days of receipt of pretrial motions, and
18 optional replies within 14 days after receipt of response. The parties shall file any and all
19 notices required under Rules 12.1 through 12.3, no later than 60 days prior to trial.
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22 IT FURTHER ORDERED that all trial briefs, proposed voir dire, proposed jury
23 instructions, exhibit lists and witness lists are due by noon on May 20, 2024.
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27 HONORABLE JENNIFER A. DORSEY
28 UNITED STATES DISTRICT JUDGE
DATED this 19th day of December, 2023.